

IPPP

File No. 32.0408

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INTERMOUNTAIN POWER PROJECT  
A DEVELOPMENT OF INTERMOUNTAIN POWER AGENCY

June 22, 1983

Mr. Brent C. Bradford  
Executive Secretary  
Utah Air Conservation Committee  
150 West North Temple  
Salt Lake City, Utah 84110

Dear Mr. Bradford:

Intermountain Power Project (IPP)  
Revised Request for Information

INTERMOUNTAIN POWER PROJECT			
File 9255 32.0408			
JUN 26-30-83 B&V		L. E. CRIGER	
R. W. DUTTON		R. T. IVEY	
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R. ICEFENHAGEN		S. HANF	
R. R. WOOD		R. G. HODLE	
T. R. SMITH		H. L. JACOBS	
R. C. MILLER		B. L. McFERRIE	
IPP		L. W. SHERRILL	
		R. D. SMITH	
		D. R. WILSON	
		P. H. WOODARD	
ACTN	INFO	FILE	ACTN INFO

D. Swenson  
D. M. Lefebvre

This is in response to your letter dated June 8, 1983, requesting additional information pertaining to issuance of a modified air quality approval order for the IPP. The December 3, 1980 approval order is being modified to reflect the downsizing of the Project from four to two generating units and certain design refinements to the air emissions control equipment. These changes will result in substantially lower air emissions and air quality impacts than were contemplated by the original approval order.

The enclosures to this letter provide the requested information. Enclosure 1 is a report by KVB, Inc., Western Engineering Division, titled "Technical Evaluation of Alternative NOx Control Technologies". KVB is an engineering and consulting firm which is one of the most prominent authorities on NOx control technology for combustion sources. KVB's report includes emissions reduction evaluations, side-effect considerations, design details of the existing combustion modification techniques and technical background. Enclosure 2 is a report by Black and Veatch Consulting Engineers, the IPP Architect and Engineer, titled "Cost Analysis of Various NOx and SO<sub>2</sub> Control Technologies for the Intermountain Power Project". Black and Veatch is a prominent architectural and engineering firm, having designed more than 38,000 megawatts of new electric generating stations and about 20% of all utility air quality control system capacity contracted for since promulgation of the Clean Air Act. Black and Veatch's report includes the requested cost estimates and economic methodology description. Enclosure 3 is a report by KVB titled "NOx BACT Evaluation for Lynndyl Site Proposed Coal" which was previously submitted to the Environmental Protection Agency in their review concerning boiler slagging.

For SO<sub>2</sub> emissions, Enclosure 2 concludes that it would be extremely difficult, if not impossible, for any scrubbing system to remove 95% of SO<sub>2</sub> emissions on a long-term basis for the IPP. Moreover, to purchase, install and operate such a scrubbing system is estimated to cost \$998 million if installed prior to commercial operation, and \$1.118 billion if installed at a later time.

Los Angeles California 90012-1111 Los Angeles California 90012-1111

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Mr. Brent C. Bradford  
June 22, 1983

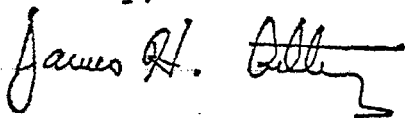
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Enclosures 1 and 2 conclude that the NOx technologies about which you inquired are either not demonstrated or will not ensure further emission reductions for a plant like the IPP. Therefore, it is unclear whether they would achieve any significant reductions reliably, or any reductions at all, in the already very low NOx emissions for the IPP. Moreover, each of the technologies is shown to be extremely costly. For example, the cost of selective catalytic reduction is estimated to be \$1.694 billion if retrofitted prior to commercial operation and \$1.256 billion if retrofitted at a later time.

We are seriously concerned about the nature of your inquiry for several reasons. First, a new approval order condition requiring the use of any of the control technologies in your inquiry could be prohibitively expensive so as to jeopardize the economic feasibility of the IPP. Also, a new approval order condition of this type could change IPP's bond market rating and thus have a major adverse impact on IPP's ability to obtain financing at a reasonable cost. If either occurred, IPP could easily become too expensive to build and would have to be cancelled. This possibility would be extremely unfortunate since the IPP is planned to generate reliable and vital electrical energy from abundant, low-sulfur Utah coal, to provide economic benefits including the creation of thousands of new jobs within Utah, and to provide the highest degree of air emissions control consistent with reliable and economically feasible operation.

If you or your staff require any additional information, please contact Mr. Roger T. Pelote at (213) 481-3412.

Sincerely,



JAMES H. ANTHONY  
Project Director  
Intermountain Power Project

RTP:glh

Enclosures

cc: Mr. D. Kircher w/Enclosures  
EPA Region VIII  
1860 Lincoln Street  
Denver, Colorado 80295

Mr. Roger T. Pelote w/Enclosures

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Mr. Brent C. Bradford  
June 22, 1983

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bcc: Mr. Henry V. Nickel w/Enclosures  
Hunton & Williams  
1919 Pennsylvania Avenue, N.W.  
Washington, D.C. 20036

Mr. James A. Holtkamp w/Enclosures  
Van Cott, Bagley, Cornwall & McCarthy  
Suite 1600  
50 South Main Street  
Salt Lake City, Utah 94144

Mr. Lowell L. Smith w/Enclosures  
Manager, Western Engineering Division  
KVB  
P.O. Box 19518  
Irvine, California 92714

✓ Mr. Donald O. Swenson w/Enclosures  
Project Air Pollution Control Systems Engineer  
Black and Veatch Consulting Engineers  
P.O. Box 8405  
Kansas City, Missouri 64114

Mr. Ronald L. Rencher w/Enclosures  
Acting General Manager  
Intermountain Power Agency  
The Atrium, Suite 101  
5250 South 300 West  
Murray, Utah 84107

Ms. Ann Garnett w/Enclosures  
Public Affairs Manager  
Intermountain Power Agency  
The Atrium, Suite 101  
5250 South 300 West  
Murray, Utah 84107

D. W. Waters  
D. Hyska  
J. H. Anthony w/Enc.  
V. L. Pruett  
R. L. Nelson w/Enc.  
B. Campbell w/Enc.  
IPP File w/Enc.  
Robert C. Burt  
Patrick P. Wong  
A. S. Buchanan  
E. N. Friesen

S. R. Seid  
J. J. Carnevale w/Enc.  
N. F. Bassin w/Enc.  
R. E. Gentner w/Enc.  
D. W. Fowler w/Enc.  
D. J. Waters  
T. L. Conkin w/Enc.  
Luis E. Escalante  
M. J. Nosanov w/Enc.  
L. A. Kerrigan w/Enc.

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